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Attorneys for Defendant  
SONICWALL, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

FINJAN LLC, a Delaware Limited Liability  
Company,

Plaintiff,

v.

SONICWALL, INC., a Delaware  
Corporation,

Defendant.

Case No. 5:17-cv-04467-BLF (VKD)

**JOINT MOTION AND [PROPOSED] ORDER  
TO EXTEND TIME FOR SUBMISSION OF  
DEPOSITION DESIGNATIONS**

1 Plaintiff Finjan LLC (“Finjan”) and Defendant SonicWall, Inc. (“SonicWall”) (collectively,  
2 “the Parties”), respectfully move the Court to extend the time by which the Parties are required to  
3 submit deposition designations.

4 Trial in this matter is scheduled to begin on Monday, May 3, 2021, and the final pretrial  
5 conference is set for Thursday, March 18, 2021. D.I. 48. The Court’s Standing Order requires the  
6 Parties to submit a Joint Pretrial Statement and Order in this matter by March 4, 2021, at least 14  
7 days before the final pretrial conference. The Court’s Standing order also requires the Joint Pretrial  
8 Statement and Order to include “deposition excerpts to be offered at trial.” In order to reduce the  
9 likelihood of the Parties designating, responding to, and objecting to deposition testimony that may  
10 become superfluous as the Parties crystallize their respective trial strategies, the Parties respectfully  
11 request that Court permit deposition designations in this matter to be exchanged as follows:  
12

- 13 • The Parties shall exchange opening deposition designations two weeks prior to the  
14 first day of trial (presently April 19, 2021);
- 15 • The Parties shall exchange counter-designations and objections to opening;  
16 designations four calendar days after opening designations are exchanged (presently  
17 April 23, 2021); and
- 18 • The Parties shall exchange objections to counter-designations four calendar days  
19 after counter-designations are exchanged (presently April 27, 2021).  
20

21 The Parties submit that the requested procedure for deposition designations will not impact  
22 the Court’s scheduled trial date or the resolution of any outstanding objections prior to trial, per the  
23 Court’s Standing Order for Civil Trials.  
24  
25  
26  
27  
28

Respectfully submitted,

By: /s/ Proshanto Mukherji

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Dated: February 1, 2021

Respectfully submitted,

By: /s/ Alice Snedeker

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*Attorneys for Defendant*

*SONICWALL, INC.*

**[PROPOSED] ORDER**

Pursuant to Parties' Stipulated Request, the schedule is changed as follows:

Event	Current Deadline	New Deadline
Deadline to file Joint Pretrial Statement & Order (excluding deposition designations)	March 4, 2021	No change
Final pretrial conference	March 18, 2021	No change
Exchange opening deposition designations	March 4, 2021	two weeks before start of trial (presently April 19, 2021)
Exchange counter-designations and objections to opening designations	March 4, 2021	four calendar days after opening designations (presently April 23, 2021)
Deadline to file pretrial briefs	April 26, 2021	No change
Objections to counter-designations	March 4, 2021	four calendar days after counter-designations (presently April 27, 2021)
Trial	May 3, 2021	No change

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
JUDGE BETH LABSON FREEMAN  
United States District Court Judge